

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRETA ROUBERT,

Plaintiff,

vs.

AMAZON, GILBANE BUILDING
COMPANY, AG-EIP 1 GEOFFREY DRIVE,
LLC, and KELLERMEYERS BERGENSON
SERVICES, LLC,

Defendants.

and

AG-EIP 1 GEOFFREY DRIVE, LLC,

Third-Party Plaintiff,

vs.

ALCS, INC.,

Third-Party Defendant.

and

ALCS, INC.,

Third-Party Plaintiff,

vs.

USA RACK INSTALLATION LLC,

Third-Party Defendant.

and

USA RACK INSTALLATION LLC,

Third-Party Plaintiff,

vs.

MG BROTHERS, LLC and ETZ RACK
INSTALLER LLC

Third-Party Defendants.

CIVIL ACTION

NO.: 2:21-cv-03091-CMR

**DEFENDANT AMAZON'S ANSWER TO THIRD-PARTY DEFENDANT, USA RACK
INSTALLATION LLC'S CROSSCLAIMS PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 13(g)**

COMES NOW, Defendant Amazon, by and through its attorneys, Wilson Elser Moskowitz Edelman & Dicker LLP, files the instant Answer to Third-Party Defendant USA Rack Installation LLC's Crossclaim Pursuant to Federal Rule of Civil Procedure 13(g), averring as follows:

1. To the extent that the averments of Paragraph 1 do not contain conclusions of law to which no response is required, they are denied with strict proof thereof demanded at trial.

2. To the extent that the averments of Paragraph 2 do not contain conclusions of law to which no response is required, they are denied with strict proof thereof demanded at trial.

3. To the extent that the averments of Paragraph 3 do not contain conclusions of law to which no response is required, they are denied with strict proof thereof demanded at trial.

WHEREFORE, Defendant Amazon is not liable to Plaintiff for negligence, solely, jointly or severally. Amazon is also not liable over, liable with, or liable to Defendant USA Rack Installation LLC, for any of the causes of action declared in the Plaintiff's Amended Complaint for the whole or any amount that may be recovered against Defendant USA Rack Installation LLC. Furthermore, Amazon is entitled to judgment in its favor as against Defendant USA Rack Installation LLC on all crossclaims, plus interest, costs, and any other relief deemed reasonable under the circumstances by this Honorable Court.

Respectfully submitted,

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

s/ Salvatore A. Clemente

Salvatore A. Clemente, Esquire
Two Commerce Square
2001 Market Street, Suite 3100
Philadelphia, PA 19103
Phone: 215.627.6900
Facsimile: 215.627.2665
Salvatore.Clemente@wilsonelser.com
Attorney for Defendant, Amazon

Date: May 16, 2022

CERTIFICATE OF SERVICE

I, Salvatore A. Clemente, Esquire, counsel for Defendant Amazon, hereby certify that the foregoing Answer to Third-Party Defendant USA Rack Installation LLC's Crossclaim Pursuant to Federal Rule of Civil Procedure 13(g) was electronically filed via this Court's electronic filing system and the Court's ECF System will automatically generate and send a Notice of Electronic Case Filing to all ECF Filing Users associated with this case, the transmission of which constitutes service of the foregoing document pursuant to LR 5.1.2(8).

Date: May 16, 2022

s/ Salvatore A. Clemente

Salvatore A. Clemente